UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL OCEAN SERVICE
Silver Spring, Maryland 20910

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STATE OF CALIFORNIA
CENTRAL COAST WATER BOARD
Received
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Dr. Robert Brackett, Director
U.S. Food and Drug Administration
Center for Food Safety and Applied Nutrition
Harvey W. Wiley Federal Building
5100 Paint Branch Parkway 11301
College Park, Maryland 20740-3835

Dear Dr. Brackett:

The National Oceanic and Atmospheric Administration's National Marine Sanctuary Program (NMSP) is concerned about impacts to water quality from food safety practices for leafy greens grown along California's Central Coast. We are writing to encourage the development and approval of guidelines that are based on sound science and are protective of both food safety and water quality.

The agricultural industry is currently developing a best practices document for leafy greens that will become mandatory after it is reviewed and approved by the U.S. Food and Drug Administration (USFDA) and the California Food and Drug Administration (CDFA). The USFDA recommendations encourage growers to eliminate any non-crop vegetation in or around fields such as shrubs and grasses that could potentially harbor wildlife. Riparian buffers, grassed waterways, filter strips and other forms of non-crop vegetation are critical conservation measures for reduction of sedimentation and filtering of other pollutants. These practices are effective runoff control measures applied throughout the nation. Removing these buffers may have significant adverse impacts on our long-term efforts to reduce agricultural pollutants draining to the Monterey Bay National Marine Sanctuary (MBNMS).

The MBNMS is a federally protected marine area adjacent to 276 miles of California's Central Coast, encompassing a rich diversity of fishes, marine mammals, seabirds and invertebrate life. It receives runoff from eleven major watersheds that support intensive agricultural production, including the Salinas Valley, the heart of the country's lettuce industry. Since 1999, the MBNMS has been working with the agricultural industry and many agency partners, including the USDA Natural Resources Conservation Service, University of California Cooperative Extension, Resource Conservation Districts and the Central Coast Agriculture Water Quality Coalition (a coalition of Farm Bureaus) through a collaborative body known as the Agriculture Water Quality Alliance (AWQA). AWQA partners work voluntarily with growers to improve water quality by implementing conservation practices that are effective at reducing agricultural pollution, including many practices involving non-crop vegetative filters. Our agricultural partners

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in the watersheds draining into the MBNMS have made significant progress in adopting these practices over the past decade.

However, as food safety concerns have affected the market place, growers are increasingly becoming unwilling to implement conservation measures, and in some cases are beginning to remove conservation practices such as vegetated ditches, buffers and grassed waterways. This is occurring despite the lack of scientific evidence indicating that such practices increase the risk of *E. coli* contamination of crops. Current research suggests that conservation practices using non-crop vegetation pose minimal risk to food safety and may even reduce harmful pathogens. This is the conclusion of a research brief published by The Center for Agroecology and Sustainable Food Systems ("Food Safety versus Environmental Protection on the Central California Coast: Exploring the Science Behind an Apparent Conflict", Fall 2006) and a separate literature review publish by the Resource Conservation District of Monterey County. Specifically, the research brief states, "Certain environmental practices already used to reduce pollutants associated with agriculture may also be used to contain and absorb harmful pathogens" and "...wildlife, such as birds and small mammals, are usually not hosts of pathogens associated with food borne illness."

Consequently, more research is needed on effective management practices that meet both food safety and water quality concerns so that growers do not have to choose between conflicting guidelines and regulations. Other Federal and State environmental and water quality agencies should also be included in these discussions and review guidelines before they become final.

The National Marine Sanctuary Program and all our AWQA partners are committed to working with the agricultural industry and food safety regulators to develop a common solution. Our goal is to allow growers to address both environmental water quality and human health concerns. Several other Federal and State agencies, including the U.S. Environmental Protection Agency, our sister agency in NOAA the National Marine Fisheries Service, and the California Regional Water Quality Control Board have also voiced similar concerns and also request involvement in development of the guidelines. By working together, we are confident that this joint goal of protecting food safety and water quality can be achieved. If you should need any additional information, please contact Dr. Holly Price at (831) 647-4247 or by email at holly.price@noaa.gov.

Sincerely,

Daniel J. Basta
Director
National Marine Sanctuary Program

cc: Kathey Means, Produce Marketing Association
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